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11 *Attorneys for Plaintiff, Deutsche Bank National Trust Company, Formerly Known as Bankers*
12 *Trust Company of California, N.A., as Trustee for American Home Mortgage Investment Trust*
13 *2005-2*

14 **UNITED STATES DISTRICT COURT**
15 **DISTRICT OF NEVADA**

16 DEUTSCHE BANK NATIONAL TRUST
17 COMPANY, FORMERLY KNOWN AS
18 BANKERS TRUST COMPANY OF
19 CALIFORNIA, N.A., AS TRUSTEE FOR
20 AMERICAN HOME MORTGAGE
21 INVESTMENT TRUST 2005-2,

22 Plaintiff,

23 vs.

24 FIDELITY NATIONAL TITLE GROUP,
25 INC.; FIDELITY NATIONAL TITLE
26 INSURANCE COMPANY;
27 COMMONWEALTH LAND TITLE
28 INSURANCE COMPANY; DOE
INDIVIDUALS I through X; and ROE
CORPORATIONS XI through XX, inclusive,

Defendants.

Case No.: 2:20-cv-01885-APG-VCF

**STIPULATION AND ORDER TO
EXTEND TIME PERIOD TO RESPOND
TO COMMONWEALTH LAND TITLE
INSURANCE COMPANY'S
OPPOSITION TO COUNTERMOTION
FOR PARTIAL SUMMARY
JUDGMENT [ECF No. 36]**

[Third Request]

Plaintiff, Deutsche Bank National Trust Company, Formerly Known as Bankers Trust
Company of California, N.A., as Trustee for American Home Mortgage Investment Trust 2005-
2 ("Deutsche Bank") and Defendant, Commonwealth Land Title Insurance Company
("Commonwealth"), by and through their attorneys of record, hereby stipulate and agree as
follows:

- 1 1. On September 23, 2020, Deutsche Bank filed its Complaint in the Eighth Judicial
- 2 District Court, Case No. A-20-821781-C [ECF No. 1-1];
- 3 2. On October 8, 2020, Commonwealth filed a Petition for Removal to this Court [ECF
- 4 No. 1];
- 5 3. On October 13, 2020, Commonwealth filed a Motion to Dismiss [ECF No. 4];
- 6 4. On November 30, 2020, Deutsche Bank filed an Opposition to Commonwealth's
- 7 Motion to Dismiss and Countermotion for Partial Summary Judgment [ECF Nos. 24
- 8 and 25];
- 9 5. On December 21, 2020, Commonwealth filed its Reply in Support of its Motion to
- 10 Dismiss and Opposition to Countermotion for Partial Summary Judgment [ECF No.
- 11 36];
- 12 6. Deutsche Bank contends that it is entitled to file a response to Commonwealth's
- 13 Opposition to its Countermotion for Partial Summary Judgment and that its deadline
- 14 to do so is January 19, 2021 [ECF No. 40];
- 15 7. Deutsche Bank's counsel is requesting a fourteen day extension to respond to
- 16 Commonwealth's Opposition, until February 2, 2021;
- 17 8. This extension is requested to allow Deutsche Bank additional time to finalize and
- 18 file its response to the pending Opposition in light of an unexpected medical
- 19 emergency experienced by the lead handling counsel for Deutsche Bank;
- 20 9. Counsel for Commonwealth does not oppose the requested extension to the extent
- 21 that a response is permitted;

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